

TIFFANY & BOSCO, PA

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Attorney for Movant Lobel Financial Corporation

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:

Chapter 13

Vince Santos and Darlene J. Santos

Bk Case No.: 13-16247-MKN

Debtors

**BREACH AND FAILURE TO COMPLY WITH TERMS OF THE ADEQUATE PROTECTION
ORDER WITH CERTIFICATE OF MAILING**

TO: Vince Santos and Darlene J. Santos

DEBTORS

TO: Monica T. Centeno

ATTORNEY FOR THE DEBTORS

TO: Rick A. Yarnall

CHAPTER 13 TRUSTEE

TO: ALL INTERESTED PARTIES

TO: THE OF THE ABOVE ENTITLED COURT

Debtors have failed to remit payments in accordance with Stipulation for Adequate Protection and Termination of Automatic Stay Upon Non-Payment ("Stipulated Order") entered between Secured Creditor, Lobel Financial Services and Debtors on November 10, 2015. To date, Secured Creditor has not received the regular monthly payment of \$358.50 due on September 30, 2015, and Debtors have failed to make all of the payments required by the Stipulated Order. Through September 30, 2015, Debtors still owe \$67.00 with another \$291.50 plus \$358.50 regular payment coming due on October 30, 2015.

The amount currently due to Lobel Financial Services which does not include the attorney's fee of \$100.00 as provided in the Stipulated Order is \$525.50. Debtor must tender one (1) check of the **CERTIFIED FUNDS ONLY**, one payment must be made payable to Lobel Financial Services in the

1 amount of \$525.50. The payment made payable to Lobel Financial Services shall be sent via certified
2 mail and delivered to: **Lobel Financial Corporation, 1150 N. Magnolia, Anaheim, California 92801**
3 and must be received within 15 days of the date of this Notice, no later than November 26, 2015.

4 IF SAID PAYMENT IS NOT REMITTED ON OR BEFORE THAT DATE TO THE ADDRESS
5 INDICATED, Secured Creditor may submit an Order to the Court to allow it to commence foreclosure
6 proceedings on the subject property described as 2004 BMW 3 Series – VIN: WBAET37484NJ47678. If
7 Debtors are represented by counsel, please note that under the Supreme Court Rules of the State of
8 Nevada, the undersigned counsel are absolutely PROHIBITED from speaking directly with Debtors in
9 regards to this Breach. Debtors should contact their attorney for any advice on curing this default. If
10 Debtors believe this default to be in error, then Debtors MUST have their attorney contact the
11 undersigned counsel prior to the deadline for payment or an Order may be entered against you.

12 Undersigned counsel is not at liberty to make additional deals with Debtors on restructuring the
13 payments beyond what has already been agreed to. If Debtors have any questions on this matter, then
14 Debtors must contact their ATTORNEY.

15 DATED this 11 day of November, 2015.

16
17 **TIFFANY & BOSCO, PA**

18 /s/ Gregory L. Wilde

19 **GREGORY L. WILDE**

20 Attorney for Movant

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Debtors

**CERTIFICATE OF MAILING BREACH AND FAILURE TO COMPLY
WITH TERMS OF THE ADEQUATE PROTECTION ORDER**

1. On November 11, 2015, I served the following document (*specify*):

BREACH AND FAILURE TO COMPLY WITH TERMS OF THE ADEQUATE PROTECTION ORDER

2. I served the above-named document by the following means to the persons as listed below:

(Check all that apply)

☒ **a. ECF System** (*You must attach the "Notice of Electronic Filing", or list all persons and addresses*

and attach additional paper if necessary)

Debtors' Counsel: Monica T. Centeno; mcenteno@mcentenolaw

Chapter 13 Trustee: Kathleen A. Leavitt; courtsecf3@las13.com

☒ **b. United States mail, postage fully prepaid**

(List persons and addresses. Attach additional paper if necessary)

Debtors' Counsel: Monica T. Centeno, 285 E. Warm Springs Rd., Suite 105,
Las Vegas, Nevada 89119

Debtors: Vince Santos & Darlene J. Santos, 8424 Wild Diamond Ave., Las Vegas, Nevada
89143

I declare under penalty of perjury the foregoing is true and

correct.

Signed on (date): 11/11/15

Laurali Cano

(NAME OF DECLARANT)



(SIGNATURE OF DECLARANT)